

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced	)	
E911 Emergency Calling Systems	)	

To: The Wireless Telecommunications Bureau

**Motion for Leave to Accept Late Filed Report**

Cordova Telephone Cooperative, Inc. ("Cordova"), by its attorneys and pursuant to Section 1.41 of the rules and regulations of the Federal Communications Commission ("FCC" or "Commission"), hereby submits this Motion seeking leave to file the enclosed E911 Phase II implementation report in compliance with the Commission's *Fourth Memorandum Opinion and Order* in the above-captioned proceeding.

As set forth in the attached Declaration of Paul Kelly, Cordova mistakenly believed it had filed its Phase II Carrier Implementation Report on or before November 9, 2000. However, in preparing its request for waiver of Sections 20.18(e) and (g) of the FCC's rules, Cordova discovered that it could not locate the report in either its own records or the FCC's records. Accordingly, Cordova is filing an updated version of the report herewith. As outlined in its report, however, Cordova has been actively working to obtain and implement its chosen technology and, therefore, this late-filed report should not harm the public interest.

Accordingly, Cordova hereby requests that the Commission accept the accompanying report.

Respectfully submitted,

**CORDOVA TELEPHONE COOPERATIVE, INC.**

By: \_\_\_\_\_/s/\_\_\_\_\_

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Telephone: (202) 371-1500

Its Attorneys

Date: September 26, 2001

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To: The Commission

**Carrier Report Regarding  
Implementation of Wireless E911 Phase II Automatic Location Identification**

Cordova Telephone Cooperative, Inc. ("Cordova"), hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI"), in compliance with the Federal Communications Commission's ("FCC" or "Commission") *Further Memorandum Opinion and Order* in the above-captioned proceeding.

**I. Background / Contact Information**

Cordova serves rural Alaska and its contact information is as follows:

Paul Kelly  
General Manager

Cordova Telephone Cooperative, Inc. (TRS# 806772)  
P.O. Box 459  
Cordova, AK 99574  
telephone: (907) 424-2345  
fax: (907) 424-2344

**II. E911 Phase II Location Technology Information**

Cordova has chosen a handset-based solution for its Phase II ALI technology. Cordova has been exploring the offerings of various vendors of handset solutions, but has yet to choose a vendor. Cordova plans to select a vendor when an ALI-capable handset that is technically compatible with Cordova's network finally becomes commercially available. Cordova plans to use the same technology, once selected, throughout its service area.

### **III. Testing and Verification**

Since Cordova is still examining multiple handset-based vendors and no handsets are available at this time, Cordova has not conducted any testing so far. Cordova anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods to gauge the accuracy of the technology it eventually chooses.

### **IV. Implementation Details and Schedule**

Cordova believes the earliest and most optimistic date by which the large, nationwide carriers will see delivery of ALI-capable handsets is December 2001. Accounting for expected delays before such handsets reach a small carrier such as Cordova and necessary testing, Cordova does not expect to be capable of selling and activating handsets prior to October 2002. Since Cordova's unique market does not support the purchase of an ALI-capable digital switch at this time, Cordova cannot afford to purchase a digital switch for at least three years without risking its financial survival. Accordingly, Cordova has developed the following implementation schedule: Cordova will begin selling and activating ALI-capable handsets by October 1, 2004. Cordova will ensure that at least 25 percent of its activated handsets are ALI-capable by December 31, 2004. Cordova will ensure that at least 50 percent of its activated handsets are ALI-capable by June 30, 2005, and that 100 percent of its activated handsets are ALI-capable by December 31, 2005. Cordova also expects a 95 percent penetration rate of ALI-capable handsets among its subscriber base by December 31, 2008.

### **V. PSAP Interface**

Cordova has yet to receive a Phase II PSAP request. Cordova expects significant software and hardware changes in order to transmit Phase II data to PSAPs. However, the majority of the transmission details remain up to the PSAP.

### **VI. Handset Information**

Since no handsets are available yet, nor are any prices, Cordova has been unable to develop a concrete strategy for handset replacement or how to handle incompatible handsets. The price of ALI-capable handsets, unavailable at this time, will affect the Cordova replacement strategy. Cordova plans to aggressively promote its new ALI-capable handsets when they become available to Cordova.

### **VII. Other Information**

Cordova would have a much better handle on how it will eventually implement its Phase II plan if the vendor products were available for testing. Unfortunately, Cordova's Phase II implementation plan depends, in large part, upon the schedules and plans of the vendors.

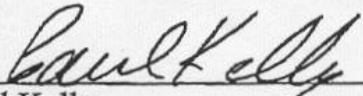
In addition, Cordova notes that the remote and rural nature of its service territory in Alaska presents additional and unforeseen problems when installing and testing location technology. The full extent of the unique circumstances confronting Cordova is set forth in Cordova's waiver request.

September 26, 2001

## DECLARATION OF PAUL KELLY

I, Paul Kelly, do hereby declare under penalty of perjury the following:

1. I am the General Manager of Cordova Telephone Cooperative, Inc.
2. In October 2000, I directed my staff to prepare and file a November 9, 2000 Carrier Implementation Report requirement indicating Cordova's handset-based technology choice. It is my recollection that Cordova had then tasked our law firm at that time to file the report on behalf of Cordova, and that the report was timely filed.
3. I have read the foregoing "Motion for Leave to Accept Late Filed Report." I have personal knowledge of the facts set forth therein, and believe them to be true and correct.

  
Paul Kelly

Date: 10-26-2001